

ATTACHMENT 1
271 PERFORMANCE MEASUREMENTS

- Wholesale Bill - SWBT is developing a measurement that shows the percent of service orders billed on the first applicable bill period for both CRIS and CABS billing.

ATTACHMENT 2

271 PERFORMANCE MEASUREMENTS

DIRECTORY SERVICES

SWBT currently provides nondiscriminatory access to DA Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. Calls from SWBT end users and end users of other carriers using SWBT DA Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying DA traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest.. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position.

OPERATOR SERVICES

SWBT currently provides nondiscriminatory access to Operator Call Completion Services on behalf of entities other than its own end user customers that is equal in quality to the services that SWBT provides to its own customers. Calls from SWBT end users and end users of other carriers using SWBT Operator Call Completion Services are processed by the Operator Services system in the order they are received. When the OS switch detects a trunk seizure on a trunk carrying OS traffic, it searches for an idle operator position and, if one is available, connects the call to the position that has been idle the longest. If no operator is available, the call is time stamped and placed in the Calls Waiting queue. When an operator position becomes available, the OS switch searches the Calls Waiting queue and connects the oldest call to the idle position.

BRANDING

SWBT will provide branding with the CLEC's name for Operator Services and DA calls for both resellers and facility based providers.

SWBT is capable of branding calls for a facility based CLEC that establishes a separate trunk group to the SWBT Operator Services switch. Branding is available in this case because the calls are handled first by the contracting carrier's switch, aggregated, and then delivered to SWBT's Operator switch over separate, dedicated trunk groups. These dedicated trunk groups allow

ATTACHMENT 2

271 PERFORMANCE MEASUREMENTS

the SWBT switch and operator to identify the call and the CLEC and brand appropriately. With a separate trunk group, SWBT will brand all calls with the CLEC's name.

SWBT ordered, purchased, and installed upgrades to its Operator Services switches to make branding capability available to resellers. This feature is now available. Provisions for branding are included in SWBT's OCC approved inter-connection agreements. SWBT has implemented branding for 18 resellers in the five-state area. The installation of this feature gives SWBT the capability in all situations to brand Operator Services and Directory Assistance calls with the name of the carrier.

ATTACHMENT 3
271 PERFORMANCE MEASUREMENTS

INTERCONNECTION TRUNKS

In 1990, the Exchange Carriers Standards Association Committee T1 established blocking levels associated with end office to tandem common transport trunk groups and end office or tandem to IXC POP trunk groups. It was agreed that the overall blocking objective between the end office serving an IXC customer and the IXC POP was 1%. If the connection was routed through the tandem, the common transport trunk group would be engineered to .5% blockage and the tandem to POP would be engineered to .5% blockage for an overall blockage of 1%. In 1993, in response to concerns from the IXCs, SWBT changed its policy to engineer common transport trunk groups from its end offices to its tandems to .25% blockage.

IXC POP ----.5% ---- SWBT Tandem ----.25% ---- SWBT End
Office

As part of its proposed CLEC contractual agreements, SWBT's proposed language in the Interconnection Trunking Appendix incorporates an overall blocking objective of 2% for calls between a SWBT customer and a CLEC customer. That would be 1% blockage on end office to tandem common transport trunk groups and 1% blockage on tandem to CLEC common transport trunk groups. However, since calls to the CLEC via the tandem are transported over the same common transport trunk group as described above, the blocking objective would be .25% for the common transport trunk group.

The trunk groups between SWBT end offices are designed for 2% blocking.

CLEC End Office --- 1% --- SWBT Tandem --- .25% --- SWBT End
Office

SWBT End Office ----- 2% ----- SWBT End
Office

Thus, CLEC calls routed to the SWBT end offices via the tandem are designed to experience only 1.25% blockage, while calls routed directly between SWBT end offices can experience 2% blockage.

ATTACHMENT 3

271 PERFORMANCE MEASUREMENTS

SWBT interconnects with CLEC switches using one way or two way trunks. For one way trunks, SWBT typically has “control” over the outgoing trunk group from its switch and the CLEC has control for those groups incoming to SWBT switches. For two way groups, the CLEC and SWBT have joint responsibility for provisioning the trunk group. For those groups over which SWBT has “control”, comparative measurements are provided for SWBT trunk groups with analogous blocking design criteria. For those groups over which the CLEC has sole or joint “control”, no comparative measurements for percent blocking are provided.

COMMON TRANSPORT TRUNK MEASUREMENTS

SWBT will report, for local common transport, the total reportable trunk groups, the number of trunk groups over threshold for 1 month and the percent over threshold for 1 month by market area. In addition, for those groups over threshold, SWBT will provide a distribution of the trunk groups by blocking percentage. For example, if the Dallas market area had 7 trunk groups over threshold with blocking percentages of 2.65, 3.35, 3.97, 4.23, 6.25, 6.97 and 10.25, the report would show the following:

<u>2% - 3%</u>	<u>3% - 4%</u>	<u>4% - 5%</u>	<u>6% - 7%</u>	<u>> 10%</u>
1	2	1	2	1

If a CLEC’s customers were experiencing a problem indicative of a trunk blockage condition, SWBT would do root cause analysis to determine if a trunk blockage condition exists. If such a condition exists, SWBT would provide to the CLEC, upon request, the specific trunk group causing the condition as well as the planned action to alleviate the blocking condition.

ATTACHMENT 4

271 PERFORMANCE MEASUREMENTS

911 DATABASE

The 911 database update process ensures that both the CLEC's updates are handled in parity with SWBT's updates. For pure resellers, updates are provided within 24 hours of the SORD file updates, just exactly as SWBT 9-1-1 updates are provided. Facility based providers use the PS911 approach that provides instant updates to the FR/DBMS (the 911 data management system) and immediate feedback via a statistical report of records processed on the file and errors that occurred. A separate error file is also immediately available. The Automatic Location Identification (ALI) data base, the data base that sends the address information to the Public Safety Answering Point (PSAP), is updated 5 times a day in the Missouri, Oklahoma, Kansas and Arkansas (MOKA) region, and 6 times a day in Texas. The updates are not instantaneous, but are made within a 24 hour period. The updates, process all changes since the last ALI update process was executed without regard to record ownership. In other words, SWBT and CLEC records update the ALI system at the same time via the ALI updates. The selective routers are updated 2 to 4 times a day in Texas (depending on the region, i.e. Houston router gets updated 4 times, Dallas get updated 2 times). The selective routers are updated once a day in the MOKA region. Based on clean input (no errors) the records would update the selective routers and the ALI data base within 24 hours of receipt of the update file.

Errors resulting from this process in the 9-1-1 Database Management System are handled by the SWB 9-1-1 Data Integrity Unit (DIU). Errors are received when the file has completed processing. Employees in the DIU are responsible for investigating each error and resolving it.

The DIU employee cannot determine if an account is a Resold Account until he/she begins investigation of the error. Only when the account is accessed in the SWB CRIS or SORD system can they determine it is Resold. SWB does not have access to the billing system of the CLEC and therefore cannot continue the investigation process. Procedures have been agreed upon between the DIU and the LSC, that when it is necessary to contact the CLEC to get additional information to clear an error, the DIU calls the LSC and refers the error.

ATTACHMENT 4

271 PERFORMANCE MEASUREMENTS

The LSC then contacts the CLEC to get the necessary information to correct the record so it can post to the 9-1-1 Database. The LSC is responsible for issuing a correcting order that flows to 9-1-1 and post. The LSC then notifies the DIU of the disposition.

The DIU then follows-up to be sure the correcting order posts and at that time deletes the original error. If the error can be corrected without an order being issued, this information is given to the DIU and the error is manually corrected.

911 DATABASE MEASUREMENTS

Currently, SWBT is not able to mechanically measure the length of time it takes to clear an error once it is created in the system. SWBT strives to meet the Recommended Standards set by the National Emergency Number Association (NENA) and recently standards were produced with regard to Data Accuracy. This is one of the measurements NENA recommends. SWB is currently working with Lucent Technology to develop the requirements for this enhancement and will implement this measurement when it becomes available.

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing, "Reply of Southwestern Bell Telephone Company." has been filed this 22nd day of April, 1998 to the Parties of Record.

A handwritten signature in cursive script, reading "Mary Ann Morris", is written over a horizontal line.

Mary Ann Morris

April 22, 1998

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